

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION

NATIONAL OILWELL VARCO, L.P.

Plaintiff,

vs.

JULIO GARZA,

Defendant.

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Civil Action No. 4:22-CV-02006

**PLAINTIFF NATIONAL OILWELL VARCO LP'S
PROPOSED ORDER FOR FORENSIC ANALYSIS PROTOCOL**

As set forth in Varco's motion for a forensic examination protocol [Dkt. 49], counsel for Varco and Garza have worked diligently to craft a short, simple order outlining an examination protocol for Garza's electronic storage devices and accounts. Exhibits A and B to Dkt. 49 reflect the parties' latest proposals prior to Varco seeking intervention from this Court via Varco's filing, Dkt. 49.

While the parties have agreed to much of the examination protocol, reasonable disputes do remain. Varco submits the attached Proposed Order for Dkt. 49 with footnotes to provide the Court with more clarity on the remaining issues.

Respectfully submitted,

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**ATTORNEYS FOR PLAINTIFF
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CERTIFICATE OF SERVICE

I certify that I served a true and correct copy of *Plaintiff National Oilwell Varco LP's Proposed Order For Forensic Analysis Protocol* on counsel of record for all interested parties on July 31, 2022, through the ECF filing system, as follows:

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